



# Department of Energy

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0037390  
Incoming 9400487

94-RPS-257

JUN 28 1994

Mr. David L. Lundstrom  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
P.O. Box 1386, MSIN N1-05  
Richland, Washington 99352

Mr. Douglas R. Sherwood  
Hanford Project Manager  
U.S. Environmental Protection Agency  
Region 10  
712 Swift Boulevard, Suite 5  
Richland, Washington 99352

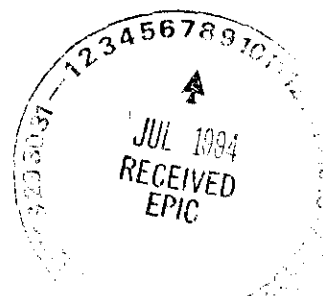
Dear Messrs. Lundstrom and Sherwood:

REQUEST FOR DEFERRAL OF SUBMITTAL OF THE HANFORD FACILITY DANGEROUS WASTE PERMIT APPLICATION DOCUMENTATION, FOR THE 222-S LABORATORY COMPLEX, REVISION 1 (TSD: TS-2-1)

The U.S. Department of Energy, Richland Operations Office (RL) requests that submittal of the Hanford Facility Dangerous Waste Permit Application (Part B) documentation, for the 222-S Laboratory Complex (222-S), Revision 1, be deferred until March 29, 1996. Currently, the 222-S Part B, Revision 1, is due to the State of Washington Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) on August 31, 1994. The 222-S Part B, Revision 0, was submitted to Ecology and the EPA on December 21, 1991, in accordance with the Hanford Federal Facility Agreement and Consent Order Milestone M-20-22.

On June 15, 1993, a letter was transmitted to Ecology and the EPA requesting a deferral of submittal of the 222-S Part B, Revision 1, to January 31, 1996. This request was based on the schedule for development of four projects that will upgrade the 222-S to be in compliance with the Washington Administrative Code Dangerous Waste Regulations. 59190

On July 21, 1993, a letter was received from Ecology (Mr. Gary Anderson) granting an extension of 180 days for submittal of Revision 1 from February 3, 1994 to August 31, 1994. At the September 29, 1993, 222-S Unit Managers' Meeting, a request was made to Mr. Anderson that he consider changing the Revision 1 submittal date from August 31, 1994 to January 31, 1996. Mr. Anderson stated that he would contact the Richland Ecology Office to request a ruling from them whether a deferral was in order. To date, this issue has not been resolved, and Mr. Anderson has since been reassigned. At the present time, an Ecology Unit Manager has not been assigned to the 222-S. 59184 36191



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Messrs. Lundstrom and Sherwood  
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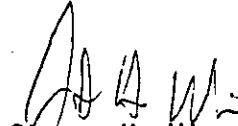
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RL, Westinghouse Hanford Company (WHC), and Pacific Northwest Laboratory are currently negotiating with Ecology on a Hanford Facility Permit Modification Schedule. The proposed modification schedule shows that the 222-S Part B, Revision 1, is scheduled to be submitted on March 29, 1996, in preparation for incorporation into the Hanford Facility Permit on August 13, 1998.

Deferral of the 222-S Part B, Revision 1, submittal would eliminate repetitive notice of deficiency cycles, would reduce the number of revisions of the Part B, and would reduce overall costs. Therefore, based on the scheduled project upgrades, the proposed Hanford Facility Permit Modification Schedule, and the cost savings involved, we request a deferral for submittal of the 222-S Part B, Revision 1, to March 29, 1996.

Should you have any questions regarding this request for deferral of the submittal of the 222-S Part B, Revision 1, please contact Mr. C. E. Clark of RL on (509) 376-9333 or Ms. S. M. Price of WHC on (509) 376-1653.

Sincerely,



Steven H. Wisness, Acting Program Manager  
Office of Environmental Assurance,  
Permits, and Policy

EAP:CEC

cc: Administrative Records, H6-08  
R. C. Bowman, WHC  
W. T. Dixon, WHC  
D. L. Duncan, EPA  
M. N. Jaraysi, Ecology  
S. M. Price, WHC  
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W. T. Dixon, WHC	D. R. Sherwood, EPA	Xref 9453649D
(J. F. Williams Jr., WHC)		

Subject: REQUEST FOR DEFERRAL OF SUBMITTAL OF THE HANFORD FACILITY DANGEROUS WASTE PERMIT APPLICATION DOCUMENTATION, FOR THE 222-S LABORATORY COMPLEX, REVISION 1 (TSD: TS-2-1)

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